

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

RACHEL
WILLIAMS, pro se

Plaintiff(s),

v.

QUICKEN
LOANS

Case: 2:16-cv-11496

Judge: Lawson, David M.

MJ: Patti, Anthony P.

Filed: 04-26-2016 At 03:36 PM

CMP WILLIAMS V. QUICKEN LOANS (DA)

Defendant(s).

COMPLAINT

- I. Defendant(s). Print the full name for each defendant. If there are more defendants, use additional pages to provide their names.

Name of Defendant(s)

1. QUICKEN LOANS

2.

3.

4.

5.

- II. Statement of claim. Briefly state the facts of your case. Describe how each defendant is involved, and exactly what each defendant did, or failed to do. Include names of any other persons involved, dates, and places. You may use additional paper if necessary.

ON OR ABOUT DECEMBER 2014 plaintiff phoned
QUICKEN LOANS RECRUITER/REPRESENTATIVE TO FOLLOW-UP
ON A JOB plaintiff WAS BEING CONSIDERED FOR.
AFTER plaintiff GAVE HER NAME QUICKEN LOANS
RECRUITER QUICKLY TRANSFERRED plaintiff TO ANOTHER
QUICKEN LOANS/RECRUITER/REPRESENTATIVE WHO TOLD

Plaintiff that she was not Allowed to work for QUICKEN loans. Plaintiff Also Applied For Subsequent jobs and was Denied opportunities For Interviews or Job offers. Plaintiff contends that Her Name has been "Black listed" by QUICKEN loans because plaintiff Filed previous DISCRIMINATION/^{RACE} Retaliation Complaints against QUICKEN loans Subsidiary, representative, associated or Affiliated companies. Which is in violation of Title VII OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED.

JURY TRAIL

III. Relief. Briefly state exactly what you want the court to do for you.

Plaintiff prays that this COURT Grant Such Relief AS AN injunction order, Monetary and punitive Damages and Attorney / Court COSTS IF INCURRED. IF Relief IS not Granted Plaintiff Will be Irreparably denied Rights Secured by TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 and THE ELLIOT - LARSEN CIVIL RIGHTS ACT.

IV. Additional Information. -- Briefly enter any additional information, you may use additional paper.


THE MICHIGAN DEPARTMENT OF CIVIL RIGHTS COMPLAINT
CASE # 461536 WAS DUAL FILED WITH
THE EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
CASE # R 23A-2015-00557C
THIS HONORABLE COURT HAS JURISDICTION TO HEAR
FACTS OF THE CASE. ORIGINAL COMPLAINT AND RIGHT
TO SUE LETTER IS ATTACHED.

V. Demand for Jury Trial. Check this box if you want your case to be decided by a jury, instead of a judge.

☒ Plaintiff demands a jury trial on all issues.

Dated:

4-26-16


Plaintiff's Signature

RACHEL WILLIAMS
Plaintiff's Printed Name

P.O. BOX 361233
Street Address

GROSSE POINTE MI 48236
City, State, Zip Code

313-404-9954
Telephone Number

WILLIAMS.RACHEL56@YAHOO.COM
E-mail Address

CHARGE OF DISCRIMINATION		COMPLAINT/CHARGE NUMBER
<i>This form is affected by the Privacy Act of 1974; see Privacy Act Statement on reverse before completing this form.</i>		MDCR # 461536 EEOC #
MICHIGAN DEPARTMENT OF CIVIL RIGHTS and THE U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION		
NAME (Indicate Mr., Ms., Mrs.) Ms. Rachel Williams		HOME TELEPHONE NO. (Include Area Code) (313) 404-9954
STREET ADDRESS, CITY, STATE AND ZIP CODE 12383 Santa Rosa Lower, Detroit, MI 48204		
Named is the employer, labor organization, employment agency, apprenticeship committee, state or local government agency who discriminated against me.		
NAME Quicken Loans	# EMPL/MEMBERS 100	TELEPHONE NO. (Include Area Code) (734) 805-5000
STREET ADDRESS, CITY, STATE AND ZIP CODE 1050 Woodward Avenue, Detroit, MI 48226		
CAUSE OF DISCRIMINATION BASED ON Retaliation		DATE OF MOST RECENT OR CONTINUING DISCRIMINATION December 11, 2014
I am a person who engaged in a protected activity and I believe I was denied hire on December 11, 2014, in retaliation for previous civil rights complaints (MDCR #442255, #442606, #445679).		
I sent my resume to a recruiter of the respondent in October 2014.		
Failure to hire/rehire 12/11/2014 Retaliation		
On or around December 11, 2014, I contacted the respondent's recruiter to check the status of my application. After providing my name to the respondent's recruiter, I was told that I can not work for the respondent. I was then transferred to a recruiter for Aerotek Inc.. I was then told by the Aerotek recruiter that I could not work for Quicken Loans. I applied directly to a Quicken Loans recruiter. I believe I am being "blacklisted" from receiving a position with the respondent, because I engaged in a protected activity.		
This complaint is based on the following law: Elliott-Larsen Civil Rights Act No 453, Public Act of 1976, as amended Title VII, US Civil Rights Act of 1964, as amended		
<div style="border: 2px solid black; padding: 5px; text-align: center;">KARYN GRIFFIN Notary Public - Michigan Wayne County My Commission Expires Jun 13, 2020 Acting in the County of <i>Wayne</i></div>		
I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.		NOTARY (When necessary to meet State and Local Requirements) <i>3/5/2015</i>
I declare under penalty of perjury that the foregoing is true and correct.		SUBSCRIBED AND SWORN BEFORE ME THIS DATE (Day, month and year)
I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number, and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		<i>[Signature]</i>
Date <i>3-5-2015</i> Signature of Charging Party / Claimant <i>Rachel Williams</i>	Commissioned in <i>Wayne</i> County Acting in <i>Wayne</i> County Commission expires <i>June 13, 2020</i>	

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Rachel Williams**
P. O. Box 361233
Grosse Pointe, MI 48236

From: **Detroit Field Office**
477 Michigan Avenue
Room 865
Detroit, MI 48226



On behalf of person(s) aggrieved whose identity is
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

23A-2015-00557

Antoinette Coburn,
Investigator

(313) 226-4637**THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:**

The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission



Enclosures(s)

Webster N. Smith,
District Director

2/2/16

(Date Mailed)

cc:

HUMAN RESOURCES MANAGER
QUICKEN LOANS
1050 Woodward Avenue
Detroit, MI 48226

THIS NOTIFICATION IS ISSUED UNDER THE
AUTHORITY OF ACTS 220 & 453, PA OF 1976 AS
AMENDED

STATE OF MICHIGAN

CADILLAC PLACE, SUITE 3-600
3054 WEST GRAND BOULEVARD
DETROIT, MI, 48202

DEPARTMENT OF CIVIL RIGHTS

NOTICE OF DISPOSITION AND ORDER OF DISMISSAL

EEOC #: R 23A-2015-00557C

MDCR #: 461536

Claimant:

Rachel Williams
P.O. Box 361233
Grosse Pointe, MI 48236

Respondent:

Quicken Loans
1050 Woodward Avenue
Detroit, MI 48226

REASON FOR DISMISSAL:

This complaint alleges that the respondent discriminated against the claimant in violation of civil rights laws.

The investigation of this complaint included a review of all information obtained during the investigation. Based upon all the evidence in the file, e.g. any applicable statements of witnesses, analysis of comparatives and review of documents, the department determined that there is insufficient evidence to proceed.

It is therefore ordered that this complaint is dismissed.

Date Dismissed : November 24, 2015

Date Mailed :

12/3/2015

/s/ Lori Vinson/Director, Civil Rights Operations

RULES OF CIVIL RIGHTS COMMISSION AND DEPARTMENT RELATING TO RECONSIDERATION AND APPEAL

- Rule 7.(1) A claimant may request of the department a reconsideration of its refusal to issue a charge. The request shall be in writing, state specifically, the grounds upon which it is based, and be filed within 30 days after the date of mailing of the notice of disposition of which reconsideration is requested. It shall be filed at any office of the department by personal delivery or by mail.*
- (2) The department may authorize a hearing on the request for reconsideration at such time and place, and before such hearing commissioner or commissioners or hearing referee or referees as it or the director may determine, and notice thereof shall be given to all parties to the proceedings.*
- Rule 18. Any party claiming to be aggrieved by a final order of the commission or the department, including without limitation a refusal to issue a charge, may appeal to the circuit court of the State of Michigan having jurisdiction provided by law within 30 days of the date of service of an appealable order.*

Note: To Secure a review by the U.S. Equal Employment Opportunity Commission of this dismissal, you must request a review in writing within 15 days of your receipt of this notice. Send your request to: EEOC Detroit District Office, 477 Michigan Ave., Suite 1540, Detroit, MI 48226.

CIVIL COVER SHEET

County in which action arose

Wayne

This civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

RACHEL WILLIAMS

(b) County of Residence of First Listed Plaintiff

Wayne

(EXCEPT IN U.S. PLAINTIFF CASES)

P.O. Box 361233

Grosse Pointe MI 48236

(c) Attorneys (Firm Name, Address, and Telephone Number)

DEFENDANTS

QUICKEN LOANS

County of Residence of First Listed Defendant

Wayne

(IN U.S. PLAINTIFF CASES ONLY)

Case: 2:16-cv-11496

Judge: Lawson, David M.

MJ: Patti, Anthony P.

Filed: 04-26-2016 At 03:36 PM

CMP WILLIAMS V. QUICKEN LOANS (DA)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

TITLE VII U.S. CIVIL RIGHTS ACT OF 1964 - AS AMENDED - ELLIOTT LORSON CIVIL RIGHTS ACT

Brief description of cause:

EMPLOYMENT RETALIATION FOR FILING PREVIOUS COMPLAINTS BASED ON RACE

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ 30,000.00

CHECK YES only if demanded in complaint:

PLUS Punitive Damages

JURY DEMAND:

☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

4-26-16

SIGNATURE OF ATTORNEY OF RECORD

Rachel Williams

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

Is this a case that has been previously dismissed?

☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

Notes :

New LawsUIT Check List

Instructions: Put a check mark in the box next to each appropriate entry to be sure you have all the required documents.

<input checked="" type="checkbox"/>	Two (2) completed Civil Cover Sheets .	Case: 2:16-cv-11496 Judge: Lawson, David M. MJ: Patti, Anthony P. Filed: 04-26-2016 At 03:36 PM CMP WILLIAMS V. QUICKEN LOANS (DA)
<input type="checkbox"/>	Enter the number of defendants named in your lawsuit in the blank below, add 2 and then enter the total in the blank. <div style="display: flex; align-items: center; margin-top: 10px;"> <div style="text-align: center; margin-right: 10px;"> $\underline{1} + 2 = \underline{3}$ </div> <div> Complaints. </div> </div> <div style="display: flex; justify-content: space-around; font-size: small; margin-top: 5px;"> # of Defendants Total </div> <div style="margin-top: 10px;"> Received by Clerk: _____ Addresses are complete: _____ </div>	
<input type="checkbox"/> If any of your defendants are government agencies : Provide two (2) extra copies of the complaint for the U.S. Attorney and the Attorney General.		
Select the Method of Service you will employ to notify your defendants:		
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> If Paying The Filing Fee: </div> <div style="width: 48%;"> If Asking That The Filing Fee Be Waived: </div> </div>		
<input type="checkbox"/>	Current new civil action filing fee is attached. Fees may be paid by check or money order made out to: <div style="text-align: center; margin: 10px 0;"> <i>Clerk, U.S. District Court</i> </div> Received by Clerk: _____ Receipt #: _____	<input checked="" type="checkbox"/>
Two (2) completed Application to Proceed in District Court without Prepaying Fees or Costs forms. Received by Clerk: _____		
Select the Method of Service you will employ to notify your defendants:		
<div style="display: flex; justify-content: space-between;"> <div style="width: 33%;"> Service via Summons by Self </div> <div style="width: 33%;"> Service by U.S. Marshal <small>(Only available if fee is waived)</small> </div> <div style="width: 33%;"> Service via Waiver of Summons <small>(U.S. Government cannot be a defendant)</small> </div> </div>		
<input type="checkbox"/>	Two (2) completed summonses for each defendant including each defendant's name and address. Received by Clerk: _____	<input checked="" type="checkbox"/>
Two (2) completed USM – 285 Forms per defendant, if you are requesting the U.S. Marshal conduct service of your complaint. <input checked="" type="checkbox"/> Two (2) completed Request for Service by U.S. Marshal form. Received by Clerk: _____		
You need not submit any forms regarding the Waiver of Summons to the Clerk. <u>Once your case has been filed, or the Application to Proceed without Prepaying Fees and Costs has been granted, you will need:</u> <ul style="list-style-type: none"> One (1) Notice of a Lawsuit and Request to Waive Service of a Summons form per defendant. Two (2) Waiver of the Service of Summons forms per defendant. Send these forms along with your filed complaint and a self-addressed stamped envelope to each of your defendants.		
Clerk's Office Use Only		
Note any deficiencies here:		